

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

**CADFI CORP; DAVID FIGUEROA;
WILFREDO TORRES**

Plaintiffs,

v.

**LUMA ENERGY, LLC; LUMA ENERGY
SERVCO LLC; AUTORIDAD DE ENERGÍA
ELÉCTRICA DE PUERTO RICO;
MUNICIPIO DE SAN JUAN; FULANOS DE
TAL 1-100**

Defendants.

CIVIL CASE NO.: **22-1357**

**PLAINTIFFS DEMAND
TRIAL BY JURY**

MOTION IN COMPLIANCE WITH ORDER

TO THE HONORABLE DISTRICT COURT:

COMES NOW the Puerto Rico Electric Power Authority (“PREPA”), through its counsel of record, and respectfully submits and prays as follows:

1. On February 6th, 2024, this Honorable Court issued an Order to show cause for PREPA’s failure to notify new counsel. [Dkt. No. 60]. PREPA sincerely apologizes to this Honorable Court for not notifying the legal representation within the set deadline. The delay in appearing before the Court was not due to a contumacious or reckless spirit.

2. As of October of last year, the principal law firm for PREPA, Díaz & Vázquez (“D&V”) resigned from hundreds of cases in state, federal and administrative forums due to PREPA’s budgetary constraints. As of said date, the undersigned’s law firm has been receiving the bulk of these cases, which are

being assigned from a Legal Department comprised of three (3) attorneys within PREPA.

3. These attorneys are dealing with, not only the matters left by the D&V law firm, but the current matters before the Puerto Rico Energy Bureau, the Financial Oversight and Management Board for Puerto Rico, and the barrage of new legal cases that arrive on a daily basis to PREPA.

4. The case of caption was recently assigned to the undersigned's firm, as a result of a courtesy telephone call from LUMA Energy's counsel to one of the associates in our Firm regarding the outstanding Order issued by the Court.

5. The undersigned attorney hereby notifies his appearance as counsel for PREPA in the instant action. Further, PREPA respectfully requests that the Court deem its February 6th Order as complied with and submits that no further delays will be entertained due to non-compliance on its behalf.

WHEREFORE, the undersigned counsel respectfully requests the Court to take notice of the foregoing and deem PREPA in compliance with the Court Order issued at Docket No. 60.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 30th day of March, 2024.

IT IS HEREBY CERTIFIED that, on this same date, the foregoing document has been electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

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